

ALLTEL Corporate Services, Inc.

655 15th Street N.W.
Suite 220
Washington, DC 20005
202-783-3970
202-783-3982 fax



DOCKET FILE COPY ORIGINAL

July 17, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED

JUL 17 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket 96-45 Federal State Joint Board on Universal Service

Dear Mr. Caton;

Enclosed for filing on behalf of ALLTEL Telephone Services Corporation are one original and four (4) copies of its Petition for Reconsideration in connection with the above-referenced matter.

Please contact the undersigned counsel should you have any question.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carolyn Hill", written in black ink.

Carolyn C. Hill

CCH/mdl

ENCLOSURES

cc: Sheryl Todd w/diskette

No. of Copies rec'd
List ABCDE

No. of Copies rec'd
List ABCDE

**Before
The Federal Communications Commission
Washington, D.C. 20554**

RECEIVED
JUL 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Federal-State Joint Board on
Universal Service

CC Docket No. 96-45

**Petition for Reconsideration of
ALLTEL Telephone Services Corporation**

ALLTEL Telephone Services Corporation, on behalf of its affiliated local exchange companies (hereinafter "ALLTEL or the ALLTEL Companies"), respectfully submits its petition for reconsideration of the Commission's Report and Order released May 7, 1997, in the above-captioned matter.

ALLTEL's Interest

The ALLTEL Companies are "rural telephone" companies within the meaning of Section 153 (37) of the Communications Act. They are wholly owned subsidiaries of ALLTEL Corporation. The ALLTEL Companies are located in fourteen states and collectively have approximately 1.6 million access lines. The areas they serve are predominantly rural and/or high cost areas, and as a result, the ALLTEL Companies will be directly affected by the Commission's Report and Order.

ALLTEL's request for reconsideration relates to the Part 54 Rules the Commission has adopted with respect to Long Term Support (LTS) or its equivalent. As discussed below, ALLTEL believes that with the de-linkage of LTS from interstate access charges and the incorporation of LTS into Part 54 of the Commission's

Rules, Universal Service Support for High Cost Areas, the Commission should not require membership in the NECA CCL pool as a condition precedent for eligible incumbent rural LECs to receive LTS or its equivalent.

I. MEMBERSHIP IN THE NECA CCL POOL SHOULD NOT BE A CRITERIA FOR RURAL LECs TO RECEIVE LTS.

In the Report and Order, the Commission held that the subsidy provided by LTS was an impermissible implicit subsidy that should not be funded through the interstate access charge system. Rather, consistent with the requirements of the Telecommunications Act of 1996, the Commission found that LTS should be treated as an explicit subsidy and funded through the interstate universal service support mechanisms. R&O paras. 750-751. The Commission agreed with the Joint Board that “the existing LTS payment structure is inconsistent with the Act because contributions to universal service must be equitable and available to all eligible telecommunications carriers.” Id. at para. 751. The Commission provided, in lieu of LTS through the access charge regime, “comparable payments, on a per-line basis, from the new federal universal service support mechanisms.” Id. ALLTEL does not disagree with the Commission’s determination that LTS must be de-linked from access charges and treated as an explicit subsidy funded by the universal service support mechanisms. However, ALLTEL does disagree with how the Commission has chosen to implement this requirement. Specifically, ALLTEL disagrees with Section 54.303 of the Commission’s Rules because it unfairly denies LTS or its equivalent to otherwise eligible incumbent LECs. Section 54.303 provides in pertinent part:

Beginning January 1, 1998, eligible telephone companies that participate in the NECA Carrier Common Line pool and competitive eligible local telecommunications carriers will receive Long Term Support. Long Term Support shall be the equivalent of the difference between the projected Carrier Common Line revenue requirement of association [NECA] Common Line tariff participants and the projected revenue recovered by the association [NECA] Common Line charge as calculated pursuant to Section 69.105 (b)(1).

ALLTEL believes that with the de-linkage of LTS from interstate access charges, membership in the NECA CCL pool is an arbitrary requirement and should not be a condition precedent to receipt of LTS. By providing LTS to rural LECs, such as the ALLTEL Companies, outside of the CCL pool, and through the universal service mechanisms, the Commission will enable rural LECs to realize the efficiencies inherent in de-pooling and to reflect those efficiencies in the interstate rates charged to their access customers.

Even under the current regime, NECA pool membership is not a requirement for any LEC to qualify for universal service fund support or DEM weighting. LECs have been able to qualify for these forms of support regardless of whether they were in or out of the pools. Moreover, ALLTEL believes that consistent with the requirements of the 96 Telecom Act, either a rural LEC qualifies for LTS or comparable payments through the universal service support mechanisms or it does not. Incumbent rural LECs should be free to remain in the NECA pool or to exit it; under either scenario, they should be permitted to receive LTS if they are eligible rural incumbent LECs. The ALLTEL Companies can and should be able to determine their LTS funding requirements regardless of their NECA pooling status. A depooled rural

LEC should be able to set its own CCL rates with its historic LTS offsetting its current CCL revenue requirement.

II. FOR THERE TO BE FAIR AND EQUITABLE TREATMENT , ALL RURAL LECS MUST HAVE THE ABILITY TO RECEIVE LTS OR COMPARABLE PAYMENTS

So long as LTS was allowed as an implicit subsidy and funded through the interstate CCL charges of incumbent LECs which had exited the NECA CCL pool, a nexus could be said to exist between the requirement of membership in the NECA CCL pool and the ability to receive LTS support. This is no longer true. Under the Report and Order, LTS or comparable support will be an explicit subsidy funded not just by former NECA CCL pool members, but by every telecommunications carrier that provides interstate telecommunications service. However, absent a change in the Commission's Part 54 Rules, not all incumbent rural LECs will be able to receive LTS or comparable payments. As earlier discussed, the Commission's Report and Order provides LTS or an LTS equivalent, effective January 1, 1998, for rural LECs in the NECA CCL pool. The Report and Order also provides universal service support, including an LTS equivalent, for non-rural incumbent LECs. Thus, on January 1, 1999, non-rural incumbent LECs can receive universal service support, including an LTS equivalent, based on proxy models. There is one group of incumbent rural LECs, though, that has been overlooked. That is those rural LECs already outside of the NECA CCL pool. In order for the Commission to maintain an equitable explicit subsidy structure, there should be rules in place which provide LTS or comparable support to otherwise, eligible rural LECs. Because the current Rules do not accomplish

this, ALLTEL urges the Commission to amend them so as to provide that an eligible incumbent rural LEC that has left the NECA CCL pool can receive LTS support or comparable payments effective January 1, 1998, and such a rural incumbent LEC is not precluded from adopting proxies on a study area by study area basis effective January 1, 1999. ALLTEL believes that such a rule revision comports with the notion of basic fairness embodied in the 96 Act with respect to eligible providers being treated in an equitable manner.

II. SEICTION 54.303 SHOULD BE AMENDED TO COVER THE RECEIPT OF LTS OR ITS EQUIVALENT BY BOTH RURAL LECs IN THE CCL POOL AND THOSE OUTSIDE OF IT

ALLTEL urges the Commission to amend Section 54.303 so as to ensure fair and equitable treatment for all rural LECs and their subscribers. To accomplish this ALLTEL believes that Section 54.303 should be amended to read as follows:

§54.303 Long Term Support

(a) Beginning January 1, 1998, eligible telephone companies that participate in the NECA Carrier Common Line pool and competitive eligible local telecommunications carriers will receive Long Term Support. Each participant's Long Term Support shall be the equivalent of the difference between its prior year's projected Carrier Common Line revenue requirement and its prior year's projected revenue recovered by the association Carrier Common Line charge as calculated pursuant to 47 C.F.R. § 69.105(b)(2). For calendar years 1998 and 1999, the Long Term Support for each eligible service area shall be adjusted each year to reflect the annual percentage change in the actual nationwide average loop cost as filed by the fund administrator in the previous calendar year, pursuant to 47 C.F.R. § 36.622. Beginning January 1, 2000, the Long Term Support shall be adjusted each year to reflect the annual percentage change in the Department of Commerce's Gross Domestic Product-Chained Price Index (GDP-CPI).

(b) Beginning January 1, 1998, eligible telephone companies who participated in the NECA Carrier Common Line pool the prior year may exit the pool and receive the Long Term Support calculated pursuant to paragraph (a) of this section.

(c) Beginning January 1, 1998, eligible rural telephone companies who exited the Carrier Common Line pool prior to this date may receive Long Term Support based upon the number of qualifying lines they serve.

(1) Such Long Term Support shall be on a per line basis and shall be the equivalent of the difference between the prior year's projected Carrier Common Line revenue requirement of association Carrier Common Line tariff participants and the projected revenue recovered by the association Carrier Common Line charge as calculated pursuant to 47 C.F.R. § 69.105(b)(2) of this chapter and divided by the number of association eligible lines. For calendar years 1998 and 1999, the Long Term Support, per line, for each eligible service area shall be adjusted each year to reflect the annual percentage change in the actual nationwide average loop cost as filed by the fund administrator in the previous calendar year, pursuant to 47 C.F.R. § 36.622. Beginning January 1, 2000, the Long Term Support, per line, shall be adjusted each year to reflect the annual percentage change in the Department of Commerce's Gross Domestic Product-Chained Price Index (GDP-CPI).

(d) Beginning January 1, 1999, eligible rural telephone companies who exited the Carrier Common Line pool prior to this date may utilize proxies on a study area by study area basis to determine their universal service support.

CONCLUSION

For the foregoing reasons, ALLTEL respectfully submit that the Commission should grant the relief requested herein and amend Section 54.303 as proposed.

Respectfully submitted,

ALLTEL Telephone Services Corporation

By: Carolyn C. Hill

Carolyn C. Hill

Its Attorney

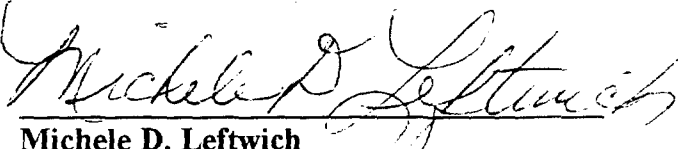
655 15th Street, N.W., Suite 220

Washington, D.C. 20005

(202) 783-3970

CERTIFICATE OF SERVICES

I, Michele D. Leftwich, certify that a copy of the foregoing Petition for Reconsideration of ALLTEL Telephone Services Corporation was served this 17th day of July 1997, by U.S. first-class mail, postage prepaid, (unless otherwise noted) to the persons on the attached service list.


Michele D. Leftwich

THE HONORABLE REED E HUNDT CHAIRMAN
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 814
WASHINGTON DC 20554

THE HONORABLE RACHELLE B CHONG COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 844
WASHINGTON DC 20054

THE HONORABLE SUSAN NESS
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 832
WASHINGTON DC 20554

THE HONORABLE JULIA JOENSON
COMMISSIONER
FLORIDA PUBLIC SERVICE COMMISSION
CAPITAL CIRCLE OFFICE CENTER
2540 SHUMARD OAK BLVD
TALLAHASSEE FLORIDA 32399-0850

The Honorable David N. Baker, Commissioner
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

THE HONORABLE SEARON L NELSON
CHAIRMAN
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
PO BOX 47250
OLYMPIA WA 98504-7250

THE HONORABLE LASKA SCHOENFELDER
COMMISSIONER
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
500 E CAPITAL AVENUE
PIERRE SD 57501

MARTHA S HOGERTY
PUBLIC COUNSEL FOR THE STATE OF MISSOURI
P O BOX 7800
HARRY S TRUMAN BUILDING ROOM 250
JEFFERSON CITY MO 65102

PAUL E PEDERSON
STATE STAFF CHAIR
MISSOURI PUBLIC SERVICE COMMISSION
P O BOX 360
TRUMAN STATE OFFICE BUILDING
JEFFERSON CITY MO 65102

LISA BOEHLEY
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8605
WASHINGTON DC 20554

CHARLES BOLLE
SOUTH DAKOTA PUC
STATE CAPITOL, 500 E CAPITOL STREET
PIERRE SD 57501-5070

DEONNE BRUNING
NEBRASKA PSC
300 THE ATRIUM
1200 N STREET PO BOX 94927
LINCOLN NE 68509-4927

JAMES CASSERLY
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF COMMISSIONER NESS
1919 M STRET ROOM 832
WASHINGTON DC 20554

JOHN CLARK
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8619
WASHINGTON DC 20554

BRYAN CLOPTON
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8615
WASHINGTON DC 20554

IRENE FLANNERY
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8922
WASHINGTON DC 20554

DANIEL GONZALEZ
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF COMMISSIONER CHONG
1919 M STREET NW ROOM 844
WASHINGTON DC 20554

EMILY HOFFNAR
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8623
WASHINGTON DC 20554

L CHARLES KELLER
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8918
WASHINGTON DC 20554

LORI KENYON
ALASKA PUC
1016 WEST SIXTH AVENUE, SUITE 400
ANCHORAGE AK 99501

DAVID KRECH
FEDERAL COMMUNICATIONS COMMISSION
2025 M STREET NW ROOM 7130
WASHINGTON DC 20554

DEBRA M KRIETE
PENNSYLVANIA PUBLIC UTILITIES COMMISSION
P O BOX 3265
HARRISBURG PA 17105-3265

DIANE LAW
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8920
WASHINGTON DC 20554

MARK LONG
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD
GERALD GUNTER BUILDING
TALLAHASSEE FL 32399-0850

ROBERT LOUBE
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8914
WASHINGTON DC 20554

SAMUEL LOUDENSLAGER
ARKANSAS PUBLIC SERVICE COMMISSION
P O BOX 400
LITTLE ROCK AR 72203-0400

SANDRA MAKEEFF
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES IA 50319

PHILIP F MC CLELLAND
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE
1425 STRAWBERRY SQUARE
HARRISBURG PA 17120

MICHAEL A MCRAE
D C OFFICE OF THE PEOPLE'S COUNSEL
1133 15TH STREET NW SUITE 500
WASHINGTON DC 20005

TEJAL MEHTA
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8625
WASHINGTON DC 20554

TERRY MONROE
NEW YORK PUBLIC SERVICE COMMISSION
THREE EMPIRE PLAZA
ALBANY NY 12223

JOHN MORABITO
DEPUTY DIVISION CHIEF, ACCOUNTING AND AUDITS
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 812
WASHINGTON DC 20554

MARK NADEL
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 542
WASHINGTON DC 20554

JOHN NAKAHATA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE CHAIRMAN
1919 M STREET NW ROOM 814
WASHINGTON DC 20554

LEE PALAGYI
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
1300 SOUTH EVERGREEN PARK DRIVE SW
OLYMPIA WA 98504

KIMBERLY PARKER
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW
ROOM 8609
WASHINGTON DC 20554

BARRY PAYNE
INDIANA OFFICE OF THE CONSUMER COUNSEL
100 NORTH SENATE AVENUE ROOM N501
INDIANAPOLIS IN 46204-2208

JEANINE POLTRONIERI
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8924
WASHINGTON DC 20554

GARY SEIGEL
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 812
WASHINGTON DC 20554

RICHARD SMITH
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8605
WASHINGTON DC 20554

PAMELA SZYMCAK
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

LORI WRIGHT
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET NW ROOM 8603
WASHINGTON DC 20554

EILEEN BENNER
IDAHO PUBLIC UTILITIES COMMISSION
P O BOX 83720
BOISE ID 83720-0074

CHARLES BOLLE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
STATE CAPITAL 500 E CAPITAL AVENUE
PIERRE SD 57501-5070

LORRAINE KENYON
ALASKA PUBLIC UTILITIES COMMISSION
1016 WEST SIXTH AVENUE SUITE 400
ANCHORAGE AK 99501

CLARA KUEHN
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

RAFI MOHAMMED
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 812
WASHINGTON DC 20036

ANDREW MULITZ
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

GARY ODDI
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

LEE PALAGYI
WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION
P O BOX 47250
OLYMPIA WA 98504-7250

JEANINE POLTRONIERI
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

JAMES BRADFORD RAMSAY
NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS
1201 CONSTITUTION AVENUE NW
WASHINGTON DC 20423

JONATHAN REEL
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 257
WASHINGTON DC 20036

BRIAN ROBERTS
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102-3298

WHITING THAYER
FEDERAL TELECOMMUNICATIONS COMMISSION
2000 L STREET NW SUITE 812
WASHINGTON DC 20036

ALEX BELINFANTE
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
WASHINGTON DC 20554

LARRY POVICH
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
WASHINGTON DC 20554

OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

INTERNATIONAL TRANSCRIPTION SERVICE
ROOM 640
1990 M STREET NW
WASHINGTON DC 20036

PACE TELECOMMUNICATIONS CONSORTIUM and
THE INTERACTIVE SERVICES ASSOCIATION
EDWIN N. LAVERGNE
J THOMAS NOLAN
GINSBURG FELDMAN AND BRESS CHARTERED
1250 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

ELLIS JACOBS
COUNCIL FOR THE EDMONT NEIGHBORHOOD
COALITION
LEGAL AID SOCIETY OF DAYTON
333 WEST FIRST STREET SUITE 500
DAYTON OH 45402

PUBLIC UTILITY COMMISSION OF TEXAS
VICKI OSWALT
DIRECTOR OFFICE OF POLICY DEVELOPMENT
7800 SHOAL CREEK BOULEVARD
AUSTIN TEXAS 78757-1098

BRITE VOICE SYSTEMS INC
DAVID F HEMMINGS
EXECUTIVE VICE PRESIDENT
7309 EAST 21ST STREET NORTH
WICHITA KANSAS 67206

RONALD A GAGNON
EXECUTIVE DIRECTOR
NOBLE
26 CHERRY HILL DRIVE
DANVERS MA 01923

CAROLYN PURCELL
EXECUTIVE DIRECTOR
DEPARTMENT OF INFORMATION RESOURCES
PO BOX 13564
AUSTIN TEXAS 78711-3564

ADAM TURNER
CONSULTANT TO THE RESIDENT REPRESENTATIVE
2121 R STREET NW
WASHINGTON DC 20006

MITCHELL SPRAGUE
MENDOCINO UNIFIED SCHOOL DISTRICT
PO BOX 1154
MENDOCINO CA 95460

ALLIED ASSOCIATED PARTNERS LP
GELD INFORMATION SYSTEMS
CURTIS T WHITE
MANAGING PARTNER
4201 CONNECTICUT AVE NW
SUITE 402
WASHINGTON DC 20008-1158

RONALD K GREENHALGH
CHIEF ENGINEER
NATIONAL RURAL ELECTRIC COOPERATIVE
ASSOCIATION
4301 WILSON BOULEVARD
ARLINGTON VA 22203-1860

STATE OF SOUTH CAROLINA
PUBLIC SERVICE COMMISSION
R GLENN RHYNE MANAGER
RESEARCH DEPARTMENT
PO DRAWER 11649
COLUMBIA SOUTH CAROLINA 29211

JEANNE HURLEY SIMON
UNITED STATES NATIONAL COMMISSION ON
LIBRARIES AND INFORMATION SCIENCE
1110 VERMONT AVENUE NW SUITE 820
WASHINGTON DC 20005-3522

LUCELLA HARRISON PRESIDENT
OAKLAND UNIFIED SCHOOL DISTRICT
1025 SECOND AVENUE
OAKLAND CALIFORNIA 94606

JUDITH A BILLINGS
SUPERINTENDENT OF PUBLIC INSTRUCTION
OLD CAPITOL BUILDING
PO BOX 47200
OLYMPIA WASHINGTON 98504-7200

DR WILLIAM J TOBIN
EXECUTIVE DIRECTOR
EARLY CHILDHOOD DEVELOPMENT CENTER
LEGISLATIVE COALITION
3612 BENT BRANCH COURT
FALLS CHURCH VA 22041

RICHARD A ASKOFF
ATTORNEY FOR NATIONAL EXCHANGE CARRIER
ASSOCIATION INC
100 SOUTH JEFFERSON ROAD
WHIPPANY NEW JERSEY 07981

ANDREW D LIPMAN
MARK SIEVERS
SWIDLER & BERLIN CHARTERED
ATTORNEYS FOR MFS COMMUNICATIONS CO INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

THE NYNEX TELEPHONE COMPANIES
JOSEPH DIBELLA
1300 I STREET NW SUITE 400 WEST
WASHINGTON DC 20005

KENNETH T BURCHETT
VICE PRESIDENT GVNW INC/MANAGEMENT
PO BOX 230339
PORTLAND OREGON 97281-0339

THE SOUTHERN NEW ENGLAND
TELEPHONE COMPANY
ANNE U MACCLINTOCK
VP REGULATORY AFFAIRS & PUBLIC POLICY
227 CHURCH STREET
NEW HAVEN CONNECTICUT 06510

DANIEL L BRENNER
NEAL M GOLDBERG
DAVID L NICOLL
COUNSEL FOR THE NATIONAL CABLE
TELEVISION ASSOCIATION INC
1724 MASSACHUSETTS AVENUE NW
WASHINGTON DC 20036

NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS
PAUL RODGERS
CHARLES D GRAY
1201 CONSTITUTION AVENUE SUITE 1102
P O BOX 684
WASHINGTON DC 20044

BELLSOUTH CORPORATION
BELLSOUTH TELECOMMUNICATIONS INC
M ROBERT SUTHERLAND
RICHARD M SBARATTA
REBECCA M LOUGH
1155 PEACHTREE STREET NE SUITE 1700
ATLANTA GEORGIA 30309-3610

MICHAEL J KARSON
ATTORNEY FOR AMERITECH
2000 WEST AMERITECH CENTER DRIVE
ROOM 4H88
HOFFMAN ESTATES IL 60196-1025

VANGUARD CELLULAR SYSTEMS INC
ROYMOND G BENDER JR
J G HARRINGTON
ITS ATTORNEYS
DOW LOHNES & ALBERTSON
1200 NEW HAMPSHIRE AVENUE NW SUITE 800
WASHINGTON DC 20037

U S WEST INC
KATHRYN MARIE KRAUSE
1020 19TH STREET NW SUITE 700
WASHINGTON DC 20036

MCI TELECOMMUNICATIONS CORPORATION
CHRIS FRENTRUP
SENIOR REGULATORY ANALYST
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20036

TELECOMMUNICATIONS RESELLERS ASSOCIATION
CHARLES C HUNTER
HUNTER & MOW PC
1620 I STREET NW
SUITE 701
WASHINGTON DC 20006

UNITED STATES TELEPHONE ASSOCIATION
MARY MCDERMOTT
LINDA KENT
CHARLES D COSSON
1401 H STREET NW
SUITE 600
WASHINGTON DC 20005

THE PERSONAL COMMUNICATIONS INDUSTRY
ASSOCIATION
MARK J GOLDEN
ROBERT R COHEN
500 MONTGOMERY STREET SUITE 700
ALEXANDRIA VA 22314-1561

ROBERTA KATZ
PETER HARTER
NETSCAPE COMMUNICATIONS CORP
487 EAST MIDDLEFIELD ROAD
MOUNTAIN VIEW CA 94043

JEFFREY BLUMENFELD
GLENN MANISHIN
CHRISTY KUNIN
CHRISTINE MAILLOUX
BLUMENFELD & COHEN
1615 M STREET NW SUITE 700
WASHINGTON DC 20036

NRTA
MARGOT SMILEY HUMPHREY KOTEEN & NAFTALIN LLP
1150 CONNECTICUT AVE NW
SUITE 1000
WASHINGTON DC 20036

NTCA
DAVID COSSON
L MARIE GUILLORY
STEVE WATKINS
2626 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20037

OPASTCO
LISA M ZAINA
KEN JOHNSON
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

DAVID R POE
YVONNE M COVIELLO
ATTORNEYS FOR TIME WARNER COMMUNI-
CATIONS HOLDINGS INC
LEBOEUF LAMB GREEN & MACRAE LLP
1875 CONNECTICUT AVENUE NW
SUITE 1200
WASHINGTON DC 20009

PAUL B JONES
JANIS A STAHLHUT
DONALD SHEPHEARD
TIME WARNER COMMUNICATIONS HOLDINGS INC
300 FIRST STAMFORD PLACE
STAMFORD CT 06902-6732

AT&T CORPORATION
MARK C ROSENBLUM
PETER H JACOBY
JUDY SELLO
295 NORTH MAPLE AVENUE
ROOM 3244J1
BASKING RIDGE NEW JERSEY 07920

STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES
DR EDWARD H SALMON COMMISSIONER
CN-350
TRENTON NEW JERSEY 08625-0350

RICHARD MCKENNA HQE03J36
ATTORNEY FOR GTE SERVICE CORPORATION
PO BOX 152092
IRVING TEXAS 75015-2092

GAIL L POLIVY
ATTORNEY FOR GTE SERVICE CORPORATION
1850 M STREET NW SUITE 1200
WASHINGTON DC 20036

NYNEX GOVERNMENT AFFAIRS
SUSAN GUYER
1300 I STREET NW SUITE 400 WEST
WASHINGTON DC 20005

KATHLEEN F O'REILLY
ATTORNEY FOR THE MICHIGAN CONSUMER FEDERATION
414 A STREET SOUTHEAST
WASHINGTON DC 20003

STATE OF WASHINGTON
WASHINGTON STATE LIBRARY
ATTENTION NANCY ZUSSY
PO BOX 42460
OLYMPIA WASHINGTON 98504-2460

KATHLEEN Q ABERNATHY
DAVID A GROSS
ATTORNEYS FOR AIRTOUCH COMMUNICATIONS INC
1818 N STREET NW
WASHINGTON DC 20036

JAMES R FORCIER
ATTORNEY FOR AIRTOUCH COMMUNICATIONS INC
ONE CALIFORNIA STREET 9TH FLOOR
SAN FRANCISCO CA 94111

CATHERINE R SLOAN
RICHARD L FRUCHTERMAN
RICHARD S WHITT
ATTORNEYS FOR WORLDCOMM INC
1120 CONNECTICUT AVENUE NW
SUITE 400
WASHINGTON DC 20036

RANDOLPH J MAY
TIMOTHY J COONEY
SUTHERLAND ASBILL & BRENNAN
ATTORNEYS FOR COMPUSERVE INC
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004-2404

GENEVIEVE MORELLI
VP AND GENERAL COUNSEL
THE COMPETITIVE TELECOMMUNICATIONS ASSOC
1140 CONNECTICUT AVENUE NW SUITE 220
WASHINGTON DC 20036

BRAD E MUTSCHELKNAUS
STEVEN A AUGUSTINO
KELLEY DRYE & WARREN
1200 NINETEENTH STREET NW SUITE 500
WASHINGTON DC 20036

PHILLIP L VERVEER
JENNIFER A DONALDSON
JENNIFER L DESMOND
WILLKIE FARR & GALLAGHER
1155 21ST STREET NW SUITE 600
THREE LAFAYETTE CENTRE
WASHINGTON DC 20036-3384

MICHAEL F ALTSCHUL
RANDALL S COLEMAN
CELLULAR TELECOMMUNICATIONS
INDUSTRY ASSOCIATION
1250 CONNECTICUT AVENUE NW SUITE 200
WASHINGTON DC 20036

FIONA BRANTON
DIRECTOR OF GOVT RELATIONS AND REGULATORY
COUNSEL
INFORMATION TECHNOLOGY INDUSTRY COUNCIL
1250 EYE STREET NW
WASHINGTON DC 20005

MARGOT SMILEY HUMPHREY
ATTORNEY FOR CENTURY TELEPHONE ENTERPRISES
INC AND TDS TELECOMMUNICATIONS CORP
KOTEN & NAFTALIN
1150 CONNECTICUT AVENUE NW
SUITE 1000
WASHINGTON DC 20036

THE BELL ATLANTIC TELEPHONE COMPANIES
LAWRENCE W KATZ
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VIRGINIA 22201

JAY C KEITHLEY
LEON M KESTENBAUM
H RICHARD JUHNKE
ATTORNEYS FOR SPRINT CORP
1850 M STREET NW
SUITE 1100
WASHINGTON DC 20036

CRAIG T SMITH
ATTORNEY FOR SPRINT CORP
PO BOX 11315
KANSAS CITY MO 64112

J MANNING LEE
TELEPORT COMMUNICATIONS GROUP INC
TWO TELEPORT DRIVE SUITE 300
STATEN ISLAND NEW YORK 10311

ROBERT J SACHS
HOWARD B HOMONOFF
CONTINENTAL CABLEVISION INC
LEWIS WHARF PILOT HOUSE
BOSTON MASSACHUSETTS 02110

BRENDA L FOX
CONTINENTAL CABLEVISION INC
1320 19TH STREET NW SUITE 201
WASHINGTON DC 20036

HOWARD J SYMONS
JEFFIFER A PURVIS
MINTZ LEVIN COHN FERRIS
GLOVSKY AND POPEO PC
701 PENNSYLVANIA AVENUE NW
SUITE 900
WASHINGTON DC 20004

RONALD PLESSER
JAMES HALPERT
MARK O'CONNOR
ATTORNEYS FOR COMMERCIAL INTERNET
EXCHANGE ASSOCIATION
PIPER & MARBURY LLP
1200 19TH STREET NW, SEVENTH FLOOR
WASHINGTON DC 20036

MICHAEL J. SHORTLEY III
ATTORNEY FOR FRONTIER CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NEW YORK 14646

EMILY WILLIAMS
ASSOCIATION FOR LOCAL TELECOMMUNICATIONS
SERVICES
1200 19TH STREET NW
WASHINGTON DC 20036

ALISON M HUGHES MPA
UNIVERSITY OF ARIZONA
HEALTH SCIENCES CENTER
2501 EAST ELM STREET
TUCSON ARIZONA 85716

BRUCE D JACOBS
JASON S ROBERTS
ATTORNEYS FOR WAVEPHORE INC
FISHER WAYLAND COOPER LEADER
& ZARAGOZA LLP
2001 PENNSYLVANIA AVENUE NW
SUITE 400
WASHINGTON DC 20006

BRIAN R MOIR
MOIR & HARDMAN
ATTORNEY FOR INTERNATIONAL COMMUNICATIONS
ASSOCIATION
2000 L STREET NW
SUITE 512
WASHINGTON DC 20036-4907

MARTIN AVERY
EXECUTIVE DIRECTOR NAVAJO NATION
WASHINGTON OFFICE
1101 17TH STREET NW SUITE 250
WASHINGTON DC 20036

MARY DENT
GOLDBERG GODLES WIENER & WRIGHT
ATTORNEY FOR APPLE COMPUTER INC
1229 NINETEENTH STREET NW
WASHINGTON DC 20036

RICHARD CIVILLE
CENTER FOR CIVIC NETWORKING INC
PO BOX 53152
WASHINGTON DC 20008

TIMOTHY R GRAHAM
ROBERT M BERGER
JOSEPH M SANDRI JR
ATTORNEYS FOR WINSTAR COMMUNICATIONS INC
1146 19TH STREET NW
WASHINGTON DC 20036

JAMES ROWE
ALASKA TELEPHONE ASSOCIATION
4341 B STREET SUITE 304
ANCHORAGE AK 99503

GARY M EPSTEIN
TEREAS D BAER
MICHEL S WROBLEWSKI
LATHAM & WATKINS
ATTORNEYS FOR PACIFIC TELECOM INC
1001 PENNSYLVANIA AVENUE NW SUITE 1300
WASHINGTON DC 20004

BRAD E MUTSCHELKNAUS
JOHN J HEITMANN
JELLEY DRYE & WARREN
ATTORNEYS FOR LCI INTERNATIONAL TELECOM CORP
1200 19TH STREET NW
WASHINGTON DC 20036

GENE BELARDI VICE PRESIDENT MOBILE MEDIA
COMMUNICATIONS INC
2101 WILSON BOULEVARD SUITE 935
ARLINGTON VIRGINIA 22201